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2 (3	DAVID R. BECK, SBN 124372 BECK & MATHIESEN, APC 700 Frederick St., Ste. 306 Santa Cruz, CA 95062 (831)429-0181		
4 5	Attorney for Plaintiffs Dan L. Whitney, Janet R. Hadley, Margaret Kornow-Brown, Eric Brelle		
6			
7	UNITED STATES DISTRICT COURT		
8	NORTHERN DISTRICT OF CALIFORNIA		
9	SAN JOSE DIVISION		
10			
Terroral Terroral	DAN L. WHITNEY, JANET R. HADLEY,) MARGARET A. KORNOW-BROWN, ERIC)	No. C0405232	
12 13	BRELLE,) Plaintiffs,)	STIPULATION AND ORDER TO EXTEND TIME TO FILE MOTION TO COMPEL	
14	v.)	DISCOVERY	
15	CHARLES WURTZ, VERISCAPE, INC.,) RENEE TADLOCK, REGINA RYGELIS,)		
16	RENEE TADLOCK, REGINA RYGELIS,) WILL ARNTZ, SAM JACOBS, GARY) BERKOWITZ, BRIAN ROE, and)		
17	DOES 1 TO 20, inclusive,)		
18	Defendants.)		
19	AND RELATED CROSS-ACTION)		
20			
	STIPULATION	<u>N</u>	
21			
22	This stipulation for an order ex	xtending time to file a	
23	discovery motion is made because the	court ordered all	
24	discovery motions to be filed by November 21, 2006. Plaintiffs		
25	intend to file a discovery motion bef	Fore November 21, 2006.	

However, counsel for plaintiffs and defendant Veriscape had a

face-to-face meet and confer on November 8, 2006. As a result

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Ī	1 of that meeting, it is believed plaintiffs' mot	ion will not be	
2	2 necessary.		
3	3		
4	4 Therefore, both parties request that plain	tiff Whitney's	
5	5 time to file a motion to compel further product	ion of documents	
6	6 on Veriscape, set 2, if necessary, be extended	one month, to	
7	wit: December 21, 2006. Such Stipulation will make best use of		
8	judicial resources, client funds, and will promote cooperation		
9	between parties.		
10	10		
11	It is hereby stipulated by and between cou	nsel for	
12	plaintiffs and defendant Veriscape, that the amount of time to		
13	file the above-referenced motion be extended fr	om November 21,	
14	2006, to December 21, 2006.		
15			
	and the same of th	n·D 1	
16	14	n·Res	
	Dated: November $\frac{14}{2006}$, 2006 David R. Bec	k,	
16	Dated: November 14, 2006 David R. Bed Attorney for	k,	
16 17 18 19	Dated: November 14, 2006 David R. Bec Attorney for Attorney for Dated: November, 2006 Dated: November, 2006 Robert Burme	k, Plaintiffs ister,	
16 17 18 19 20	Dated: November, 2006	k, Plaintiffs ister, Defendant	
16 17 18 19 20 21	Dated: November, 2006	k, Plaintiffs ister, Defendant	
16 17 18 19 20 21	Dated: November, 2006	k, Plaintiffs ister, Defendant	
16 17 18 19 20 21 22 23	Dated: November, 2006	k, Plaintiffs ister, Defendant	
16 17 18 19 20 21 22 23 24	Dated: November 14, 2006 David R. Beck Attorney for 2006 Dated: November, 2006 Robert Burme Attorney for Veriscape, I	k, Plaintiffs ister, Defendant	
16 17 18 19 20 21 22 23 24 25	Dated: November, 2006	k, Plaintiffs ister, Defendant	
16 17 18 19 20 21 22 23 24 25 26	Dated: November, 2006 David R. Beck Attorney for Attorney for Attorney for November, 2006 Robert Burme Attorney for Veriscape, I	k, Plaintiffs ister, Defendant	
16 17 18 19 20 21 22 23 24 25	Dated: November, 2006 David R. Beck Attorney for Attorney for Attorney for Veriscape, I	k, Plaintiffs ister, Defendant	

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1 of that meeting, it is believed plaintiffs' motion will not be 2 necessary. 3 4 Therefore, both parties request that plaintiff Whitney's 5 time to file a motion to compel further production of documents 6 on Veriscape, set 2, if necessary, be extended one month, to 7 wit: December 21, 2006. Such Stipulation will make best use of 8 judicial resources, client funds, and will promote cooperation 9 between parties. 10 11 It is hereby stipulated by and between counsel for plaintiffs and defendant Veriscape, that the amount of time to 12 13 file the above-referenced motion be extended from November 21, 2006, to December 21, 2006. 14 15 Dated: November _______, 2006 16 David R. Beck, 17 Attorney for Plaintiffs 18 Dated: November 14, 2006 19 20 Attorney for Defendant Veriscape, Inc. 21 22 23 24 25 26 27 28

and a ORDER IT IS HEREBY ORDERED that the time for plaintiff Whitney to file a motion for further production of documents, set 2, is extended from November 21, 2006 to December 21, 2006. IT IS FURTHER ORDERED that counsel for plaintiffs shall serve a copy of this order on all interested parties. Dated: November 15, 2006 Patricia Trumbull, Judge of the United States District Court